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## HAMILTON INDUSTRIAL PARK REDEVELOPMENT PROJECT

### South Plainfield, New Jersey

#### Proposed Scope of Work for Remediation Planning

##### Proposal Basis and Overview

As previously discussed with USEPA, the Hamilton Industrial Park PRP Group (HIPG) has made significant progress in initiating a Superfund Redevelopment Initiative (SRI) project at the Hamilton Industrial Park located in South Plainfield, New Jersey. Based on discussions with Borough of South Plainfield officials, local real estate planners and commercial developers, the HIPG believes that the Hamilton Industrial Park site is a viable location for significantly upgraded mixed retail and commercial use which would serve to complement and enhance the neighboring downtown business district. The current conceptual redevelopment plan is provided on the attached figure.

Given the valuable public comment received during two public meetings held by the Borough Council of South Plainfield, and the subsequent unanimous vote of support by the Borough Council for the concept of redevelopment of the Hamilton Industrial Park site, the HIPG is actively assessing options to accelerate the environmental investigation and remediation planning activities currently being implemented by USEPA in order to initiate the redevelopment of this site in a timely manner. To that end, the HIPG has developed this scope of work for completing the remaining portions of the RI/FS for the Hamilton Industrial Park site so as to facilitate and expedite this SRI project.

Specifically, HIPG's efforts in completing the RI/FS as part of the overall redevelopment planning effort will be to integrate the risk assessment and remediation planning with the proposed reuse of the site for retail and commercial uses. In particular, the risk assessment and remediation planning will focus on the remedial requirements for on-site soils and "source materials" (i.e., those materials that may be acting as a continuing source to observed ground water, sediment and/or soil contamination, including any "hot-spot" sediment areas in the on-site portion of the stream).

Taking into consideration (1) the scope of work defined for on-site soils in the March 2000 *Final Work Plan for Remedial Investigation/Feasibility Study, Cornell-Dubilier Electronics Superfund*

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Site, South Plainfield, New Jersey, and (2) what would constitute an efficient point to transition the project for SRI purposes, HIPG's proposed scope of work includes the following tasks:

**Task 1 – Remedial Investigation**

1. Preliminary Data Assessment
2. Phase II Data Collection

**Task 2 – Remediation Planning**

1. Risk Assessment
2. Remediation Planning

Given USEPA's RI/FS Work Plan schedule, it is anticipated that these project tasks can commence upon receipt of USEPA's Phase I validated data. Based on discussions with USEPA on August 23, 2000, the HIPG understands that the Phase I field work was to be completed in mid-September 2000. According to USEPA's RI/FS Work Plan schedule, if sampling was completed by mid-September, then the validated data should be available by mid-November 2000. HIPG anticipates that following receipt of the validated Phase I data, the scope of work outlined below can be completed in approximately 6 to 8 months.

**TASK 1 – REMEDIAL INVESTIGATION**

***Task 1.1: Preliminary Data Assessment***

This task includes compilation and evaluation of existing data and USEPA's Phase I RI data to determine if additional sampling will be necessary in order to perform a site-specific risk assessment and to complete remediation planning as part of the redevelopment project. This task will include the following work:

- a. Compiling and mapping USEPA's Phase I RI soil, sediment and ground water data, and comparing these data with existing data previously compiled for the site;
- b. Conducting a preliminary risk-based screening to identify potential hot-spots and data gaps;
- c. Assessing the ground water data relative to risk-based screening levels and available regional data to identify any potential concerns with respect to remediation requirements and/or redevelopment plans for the site;
- d. Identifying any further site characterization needs (environmental and/or geotechnical) to fill data gaps and/or delineate contaminant hot-spots; and

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- e. Participating in a technical meeting(s) with USEPA to discuss the preliminary data assessment and proposed Phase II sampling.

To complete this task efficiently, HIPG will request that USEPA's data be made available in an accessible electronic format.

#### ***Task 1.2: Phase II Data Collection***

Based on the findings of the preliminary data assessment conducted under Task 1, any necessary Phase II sampling will be implemented to collect certain critical data necessary to (1) perform a site-specific risk assessment, and (2) conduct remediation planning. The Phase II data will be validated prior to use for risk assessment and remediation planning purposes.

For planning purposes, it is assumed that the existing RI plans (e.g., HASP, QAPP, PMP, CRP) will be utilized with only minor modifications, and that only a Phase II sampling and analysis plan will need to be prepared.

### **TASK 2 – REMEDIATION PLANNING**

#### ***Task 2.1: Risk Assessment***

On completion of Task 1, a site-specific risk assessment will be conducted to support a focused feasibility study for the site. This risk assessment will be prepared in the context of the SRI project, and will include the following work:

- a. Conducting a site-specific human health risk assessment for on-site soil concentrations under current (baseline) conditions and planned post-redevelopment conditions. The risk assessment will include an evaluation of potential risks to on-site and off-site receptors associated with existing contamination in on-site soils, and an assessment of the potential for the on-site soils to act as source of contamination to ground water and sediments.
- b. Identifying any hot-spots that will need to be addressed as part of the remediation/redevelopment plan in order to achieve acceptable post-redevelopment risk levels.

#### ***Task 2.2: Remediation Planning***

As Task 2.1 progresses, the remediation requirements associated with the redevelopment plans will be evaluated by performing a focused feasibility study (FFS), taking into consideration

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potential risks associated with proposed future land uses. This task may include the following work:

- a. Compiling a list of appropriate remedial technologies to undergo screening. A range of alternatives consistent with the redevelopment plans will be compiled, including,
  - No action;
  - Hot-spot and/or buried equipment removal;
  - Installation of engineering controls (e.g., buildings, paving and/or soil caps consistent with redevelopment plans);
  - Consolidation of soils, sediments and/or demolition debris within the area to be covered by soils, pavement and/or buildings; and
  - Stabilization controls to be implemented pending further work (e.g., the on-site stream and wetlands areas).
- b. These alternatives will be developed to address contaminated media remaining at the site. At this time, PCBs are considered to be a principal contaminant of concern in site soils and sediments. Should VOCs also be identified as contaminants of concern, additional remedial alternatives would also to be considered. In addition, the scope of possible ground water monitoring/containment systems may need to be considered as they may impact the proposed building and paving plans.
- c. Evaluating the screened remedial alternatives in terms of the following nine criteria: short-term effectiveness, long-term effectiveness; reduction of toxicity, mobility or volume; implementability; cost; compliance with ARARs; overall protection of human health and the environment; state acceptance; and community acceptance. Following the individual evaluation of each alternative relative to the nine criteria, a comparative analysis between alternatives will be performed.
- d. Preparing a FFS Report which provides documentation of the initial remedial alternative screening analysis and the detailed evaluation of the alternatives. It will identify any necessary changes in the redevelopment plan necessary to address potentially unacceptable risks.
- e. Presenting the risk-based evaluation for the final redevelopment plan to the community and USEPA.

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Based on its planning consultant's work conducted to date, the HIPG expects that the Hamilton Industrial Park site will be sufficiently attractive to potential developers that the redevelopment activities can be initiated following USEPA's approval of the FFS Report.

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